

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

Not on P.O. COPY

RECEIVED
PLEASE PLACE LABEL IN THIS SPACE
APR 10 1985 26 APR 1985
WMD-RAIU
EPA, REGION V

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER										APPROVED		DATE RECEIVED (yr., mo., & day)							
F	1	L	D	9	8	1	0	0	2	2	1	5	A	8	5	0	4	1	0

I. NAME OF INSTALLATION

AFFILIATED METALS COMPANY

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 P O BOX 1306

CITY OR TOWN

ST.

ZIP CODE

4 GRANITE CITY IL 62040

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 1020 NIEDRINGHAUS AVE

CITY OR TOWN

ST.

ZIP CODE

6 GRANITE CITY IL 62040

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

2 DARRELL JOHNSON PLANT ENGINEER 618-451-4700

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 AFFILIATED METALS COMPANY INCORPORATED

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION

☐ B. TRANSPORTATION (complete item VII)

☐ C. TREAT/STORE/DISPOSE

☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR

☐ B. RAIL

☐ C. HIGHWAY

☐ D. WATER

☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION

☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.



U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA
I.D. NO.

Not on R.O.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

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APR 10 1985

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FOR OFFICIAL USE ONLY

COMMENTS

[illegible]

15 16		INSTALLATION'S EPA I.D. NUMBER										APPROVED		DATE RECEIVED (yr., mo., & day)	
S		1LD981002215										T/A	C		
F													1		
														A	850410

I. NAME OF INSTALLATION

A	F	F	I	L	I	A	T	E	D	M	E	T	A	L	S	C	O	M	P	A	N	Y
---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

[illegible]

CITY OR TOWN

ST.

ZIP CODE

[illegible]

**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**



This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• ILD981002215

AFFILIATED METALS CO.
PO BOX 1306
GRANITE CITY, IL. 62040

INSTALLATION ADDRESS

1020 NIEDRINGHAUS AVE.
GRANITE CITY, IL. 62040

5/9/85

NON-NOTIFICATION AND NON-FILER DISPOSITION RM

1190400012

10/22/1985

Notified

1. Non-Notifier Non-Filer ✓

2. U.S.E.P.A. ID Number for Non-Filers ILD 981002215

3. Name of Facility: Affiliated Metals

Facility Mailing Address: P.O. Box 1306

Granite City Illinois 62040
City or Town State Zip Code

4. Location of Facility: 1020 Niedringhaus

Granite City Illinois 62040
City or Town State Zip Code

5. Facility Contact: Darrel Johnson
Name and Title

Phone Number: (618) 451-4700
Area Code and Number

6. Type of Hazardous Waste Activity if Determined:

☒ Generation ☐ Transportation

☒ Treat/Store/Dispose (Circle Applicable Activities)

☐ Underground Injection

7. Description of State Follow-up Action (Including Name of State Assignee, File Data Reviewed, Person(s) Contacted by State, Date(s) and Type of Contact(s), and Information Obtained):

8. List of Significant Apparent Violations: 722.111, 725.116, 725.131, 725.151, 725.212, 725.292 b)

9. List of Supporting Documents Attached: ISS Inspection checklist, 11/19/85 Memo, CIDECL Dated 11/21/85, CIDECL Dated 12/20/85

TO BE COMPLETED BY ENFORCEMENT SECTION

10. Type of Enforcement Action Recommended: Further action depends upon results of pre-enforcement conference.

11. Disposition Form Signed and Dated by State Enforcement Section:

21/10/86

Bruce Carlson



Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-5544

February 10, 1986

Ms. Jodi Traub
Waste Management Division
U.S. Environmental Protection
Agency, Region V
230 South Dearborn Street
Chicago, Illinois 60606

Re: Non-Notification/Non-Filer Reports

RECEIVED
FEB 14 1986

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

Dear Jodi:

Enclosed please find completed a non-notification and non-filer disposition form, with attachments, for the following facilities:

✓ Affiliated Metals, Inc./Granite City, Madison County, Illinois
(LPC 1190400012)

L. C. Metals, Inc./Granite City, Madison County, Illinois
(LPC 1190400013)

If, after follow up by this Agency, these facilities have not achieved compliance, we will refer the violations for enforcement.

Sincerely yours,

Bruce L. Carlson
Staff Attorney
Enforcement Programs
Division of Land Pollution Control

Enclosures

cc: FOS/DLPC, Collinsville Regional Office
Records Unit/DLPC
Gary King, Enforcement Programs

RECEIVED
FEB 14 1986
SOLID WASTE BRANCH
U.S. EPA, REGION V

NON-NOTIFICATION AND NON-FILER DISPOSITION FORM

RECEIVED
NOV 22 1985

STADLER

1. Non-Notifier _____ Non-Filer ☒
2. U.S.E.P.A. ID Number for Non-Filers ILD 981002215
3. Name of Facility: Affiliated Metals
Facility Mailing Address: P.O. Box 1306
Granite City Illinois 62040
City or Town State Zip Code
4. Location of Facility: 1020 Niedringhaus
Granite City Illinois 62040
City or Town State Zip Code
5. Facility Contact: Darrel Johnson
Name and Title
Phone Number: (618) 451-4700
Area Code and Number
6. Type of Hazardous Waste Activity if Determined:
☒ Generation _____ Transportation
☒ Treat/Store/Dispose (Circle Applicable Activities)
_____ Underground Injection
7. Description of State Follow-up Action (Including Name of State Assignee, File Data Reviewed, Person(s) Contacted by State, Date(s) and Type of Contact(s), and Information Obtained):
8. List of Significant Apparent Violations: 722.111, 725.116, 725.131
725.151, 725.212, 725.292 b)
9. List of Supporting Documents Attached: ISS Inspection checklist.
11/19/85 Memo
CIF Dated 11/21/85
FEEL Dated 12/20/85

TO BE COMPLETED BY ENFORCEMENT SECTION

10. Type of Enforcement Action Recommended: Further action depends upon results of pre-enforcement conference.

11. Disposition Form Signed and Dated by State Enforcement Section:

2110185Bruce Carlson

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A General Facility Standards

I. General Information

USEPA Number: ILD981002215 IEPA Number: 1190400012

Major Facility: YES/NO Notified As: Generator Regulated As: E/TSD

(A) Facility Name: Affiliated Metals Inc.

(B) Street: 1020 Wedderburns P.O. Box 1306

(C) City: Granite City (D) State: Illinois (E) Zip Code: 62040

(F) Phone: (618) 451-4700 (G) County: Madison

(H) Operator: Same as Above

(I) Street: _____

(J) City: _____ (K) State: _____ (L) Zip Code: _____

(M) Phone: _____ (N) County: _____

(O) Owner: Same as Above

(P) Street: _____

(Q) City: _____ (R) State: _____ (S) Zip Code: _____

(T) Phone: _____ (U) County: _____

Region: S (V) Date of Inspection: 09/11/85 (W) Time: (From) 2:20 (To) 3:30

Type of Inspection: ☒ ISS ☐ RECORD REVIEW ☐ SAMPLING ☐ CITIZEN COMPLAINT
☐ CLOSED ☐ WITHDRAWAL ☐ OTHER ☐ PART B

F/U 1/1/ (Date of Initial Inspection)

(X) Weather Conditions: Overcast, 75°

Area	Section
OTH	703.150a)2)
OTH	722.111
OTH	722.134b)
OTH	725.115
OTH	725.116
OTH	725.131
OTH	725.137
OTH	725.151a)
OTH	725.173
CL/PC	725.212
OTH	725.292b)
OTH	725.294

Class I Class II

1 1
1
N/A
 1
1
1
 1
1
 1
1
1
 1
6 5

(AA) Preparer Information

Name

Michael D. Grant

Agency/Title

IEPA/EPS

Telephone

(618) 345-4606

TOTAL Class I's & II's

(Y) Person(s) Interviewed	Title	Telephone
<u>Darrel Johnson</u>	<u>Plant Manager</u>	<u>(618) 451-4700</u>
(Z) Inspection Participants	Agency/Title	Telephone
<u>Jeff Benbow</u>	<u>IEPA/APC</u>	<u>(618) 345-0700</u>
<u>Nick Mahandt</u>	<u>IEPA/WPC</u>	<u>(618) 345-6220</u>
<u>Pat McCarthy, Mike Grant</u>	<u>IEPA/LPC</u>	<u>(618) 345-4606</u>

II. Section A: Scope of Inspection.

- Interim Status standards for the treatment, storage or disposal of HAZARDOUS WASTES SUBJECT TO 35 Ill. Adm. Code 725.101. Complete Inspection Form A, Sections B, C, D, E, and G.
- Place an "X" in the box(es) corresponding to the facility's treatment, storage or disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)

Inspection Form A section(s)

S01	<input type="checkbox"/>	storage in containers	I
S02	<input checked="" type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K, F
T02	<input type="checkbox"/>	treatment in surface impoundment	K, F
D83	<input type="checkbox"/>	disposal in surface impoundment	K, F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M, F
D80	<input type="checkbox"/>	disposal in landfill	N, F
T03	<input type="checkbox"/>	treatment by incineration	O, P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Part A Application has not been filed.

Other Activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

- Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application. *No Part A filed.*
- Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 35 Ill. Adm. Code 725.101(c). Provide a brief rationale for the possible exclusion.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

Yes No NI* Remark

(A) Has the Regional Administrator been notified regarding:

1. Receipt of hazardous waste from a foreign source?
2. Facility expansion?

NA

NA

(B) General Waste Analysis:

1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

NA

NA

NA

*Waste is spent pickle liquor
a listed hazardous waste.*

*No waste accepted
from off-site*

(C) Security - Do security measures include:
(if applicable)

1. 24-Hour surveillance?
2. Artificial or natural barrier around facility?
3. Controlled entry?
4. Danger sign(s) at entrance?

✓

✓

✓

✓

(D) Do Owner or Operator Inspections Include:

1. Records of malfunctions?
2. Records of operator error?
3. Records of discharges?

✓

✓

✓

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	---	✓	---	-----
5. Safety, emergency equipment?	---	✓	---	-----
6. Security devices?	---	✓	---	-----
7. Operating and structural devices?	---	✓	---	-----
8. Inspection log?	---	✓	---	-----
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	---	✓	---	-----
2. Job descriptions?	---	✓	---	-----
3. Description of training?	---	✓	---	-----
4. Records of training?	---	✓	---	-----
5. Have facility personnel received required training by 5-19-81?	---	✓	---	-----
6. Do new personnel receive required training within six months?	---	✓	---	-----
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	---	NA	---	Waste is Corrosive
2. No smoking signs?	---	NA	---	-----
3. Separation and protection from ignition sources?	---	NA	---	-----

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

Yes	No	NI*	Remarks
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Spillage observed around acid work tanks.

(B) If required, does the facility
have the following equipment:

1. Internal communications or
alarm systems?
2. Telephone or 2-way radios
at the scene of operations?
3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

Yes	No	NI*	Remarks
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Indicate the volume of water and/or foam available for fire control:

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?
2. Is emergency equipment
maintained in operable
conditions?

Yes	No	NI*	Remarks
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

(D) Has owner or operator provided
immediate access to internal
alarms? (if needed)

Yes	No	NI*	Remarks
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

(E) Is there adequate aisle space for unobstructed movement?

NA

VI. CONTINGENCY PLAN AND EMERGENCY PROCEDURES.
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI*

Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable).)

— ✓ —

A contingency plan has not been established.

2. Arrangements agreed by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

— ✓ —

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

— ✓ —

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

— ✓ —

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

— ✓ —

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?		<input checked="" type="checkbox"/>		<u>No Contingency Plan</u>
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?		<input checked="" type="checkbox"/>		
2. Is coordinator familiar with all aspects of site operation and emergency procedures?		<input checked="" type="checkbox"/>		
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?		<input checked="" type="checkbox"/>		
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?		<u>NA</u>		

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?		<u>NA</u>		<u>No waste received from off-site.</u>
2. Are records of past shipments retained for 3 years?		<u>NA</u>		
(B) Does the owner or operator meet requirements regarding manifest discrepancies?		<u>NA</u>		

*Not Inspected

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

____ ✓ ____

2. Does the operating record contain the following information:

- **b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

____ ✓ ____

- c. The location and quantity of each hazardous waste within the facility?

____ NA ____

Only one hazardous waste stream observed at facility.

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

____ NA ____

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

____ ✓ ____

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

____ ✓ ____

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

____ ✓ ____

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	—	/	—	<u>No closure Plan</u>
2. Has this plan been submitted to the Regional Administrator	—	/	—	_____
3. Has closure begun?	—	/	—	_____
4. Is closure estimate available by May 19, 1981?	—	/	—	_____
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				
	—	—	—	_____

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are containers in good condition?	—	—	—	_____
2. Are containers compatible with waste in them?	—	—	—	_____
3. Are containers stored closed?	—	—	—	_____
4. Are containers managed to prevent leaks?	—	—	—	_____
5. Are containers inspected weekly for leaks and defects?	—	—	—	_____
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	—	—	—	_____

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	-----
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	---	---	---	-----

J
TANKS

Facility Name: Associated Metals

Date of Inspection: 9/10/85

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	✓			Tank is concrete was not determined whether tank was acid resistant.
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	✓			-----
3. Do continuous feed systems have a waste-feed cutoff?		NA		Not a continuous feed system. Batch.
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?		NA		Tank stores spent pickle liquor
5. Are required daily and weekly inspections done?	✓			-----
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)		NA		-----
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)		NA		-----

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	_____	_____	_____	_____
4. Are inspection procedures followed according to 265.403?	_____	_____	_____	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	_____	_____	_____	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	_____	_____	_____	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261. or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	_____	_____ <input checked="" type="checkbox"/>	_____	<i>No waste has been shipped off-site to date.</i>
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	_____	<i>NA</i>	_____	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	_____	<i>NA</i>	_____	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	_____	NA	_____	_____
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	_____	NA	_____	_____
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	_____	NA	_____	_____
6. The total quantity of waste(s) and the type and number of containers loaded?	_____	NA	_____	_____
7. Required certification?	_____	NA	_____	_____
8. Required signatures?	_____	NA	_____	_____
(C) Does the owner or operator submit exception reports when needed?	_____	NA	_____	_____

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	_____	NA	_____	_____
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	_____	NA	_____	_____
(C) If required, are placards available to transporters of hazardous waste?	_____	NA	_____	_____

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?		NA		
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?		✓		* See section J HAN
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?		NA		
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?				
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?				
c. Do continuous feed systems have a waste-feed cutoff?				
d. Are required daily and weekly inspections done?				
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?				
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)				

See Section J
for information
on Tanks

VI. RECORDKEEPING and REPORTING

Yes - No	NI*	Remarks
----------	-----	---------

- | | | | |
|-----|--|-------|--|
| (A) | Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years? | — ✓ — | <i>No reports have been kept to date</i> |
| (B) | Has the generator submitted Annual Reports and Exception Reports as required? | ✓ | <i>No annual report has been filed.</i> |

VII. INTERNATIONAL SHIPMENTS

(Part 262, Subpart E)

Has the installation imported
or exported Hazardous Waste?

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste,
has a generator:
 - a. Notified the Administrator
in writing?
 - b. Obtained the signature of the
foreign consignee confirming
delivery of the waste(s) in the
foreign country?
 - c. Met the Manifest requirements?
2. Importing Hazardous Waste,
has the generator:

Met the manifest requirements?

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

An ISS inspection was conducted in conjunction with a multi-media inspection. The facility did not file a notification to USEPA until April of 1985. The facility generates spent pickle liquor, K062 and has not shipped any off-site since the facility began operation in 1983. The facility notified as a Generator, however, as a result of not shipping the waste off in the required 90 days, the facility is regulated as a TSD and subject to the requirements of 725. Mr. Johnson said a RCRA program has not been implemented, thus the facility did not have any of the required documents. Since the inspection was conducted with the other Divisions, safety and emergency equipment was not inspected this date.

The spent pickle liquor is piped to a concrete in-ground, open tank. As mentioned, none of this material has been shipped off site. Also observed was an accumulation of waste oil. After the metal is pickled, it is submerged in oil. The excess oil runs off the metal into a drip rack. The level of the oil in the drip rack was near the top of the drip rack. An analysis of the oil was not available. The following violations were observed this date.

703.150(a)(2)

722.111

722.134(b)

725.115

725.116

725.131

725.137

725.151

725.173

725.212

725.292(b)

725.294

MDG:jlr/0074L

M E M O R A N D U M

DATE: November 19, 1985
TO: Division File
FROM: Mike Grant^{mp*} - DLPC - Collinsville
SUBJECT: LPC 1190400012 - Madison County - Granite City/Affiliated Metals, Inc. - ILD981002215

On September 10, 1985, a multi-media inspection was conducted at Affiliated Metals in Granite City, Illinois. Representing the Agency were Nick Mahlandt, Division of Water Pollution Control, Jeff Benbenek, Division of Air Pollution Control, Pat McCarthy and Mike Grant from the Division of Land Pollution Control. Upon arrival we met with the Plant Manager, Darrel Johnson.

Affiliated Metals notified USEPA as being a generator of hazardous waste and obtained a USEPA ID number on April 10, 1985. The purpose of our inspection was to determine whether or not the subject facility was in compliance with the 722 requirements for facilities regulated as a generator. From discussions with Mr. Johnson, a RCRA program has not been implemented. Affiliated Metals has a pickling operation, thus K062, spent pickle liquor, is generated. Mr. Johnson stated that none of the waste has been shipped off-site since the operation began in 1983.

The spent pickle liquor is pumped from the acid work tanks to allow the addition of sulfuric acid to increase the concentration. The waste goes into a concrete open tank. Mr. Johnson stated that he thought the tank was approximately 15 feet in depth. This portion of the facility is located in a building to the south of the process area. There was no lighting in this building and the depth of waste in the tank was indeterminate. It was also not determined whether the tank was constructed of acid resistant concrete.

Since the facility has not shipped any of the spent pickle liquor off-site since 1983, the facility is regulated as a TSD and subject to the full requirements of 725.

Another wastestream was also observed. After the metal is pickled and rinsed, it is then submerged in oil. The metal is then held over a drip rack where excess oil drips off of the metal. During our inspection, the level of oil in the drip rack was near the top of the rack. A tank associated with this oil was also in place. Mr. Johnson said this oil has been used as a dust suppressant inside the building. Mr. Johnson was asked if he had an analysis of this waste oil and he said no.

LPC 1190400012
Madison County
Granite City/Affiliated Metals, Inc.
ILD981002215

-2-

November 19, 1985

The following apparent violations were observed:

703.150(a)(2)
722.111
722.134(b)
725.115
725.116
725.131
725.137
725.151
725.173
725.212
725.292(b)
725.294

MDG:jlr/0073L

cc: DLPC - Collinsville
cc: DAPC - Collinsville
cc: DWPC - Collinsville
cc: Andy Volmer
cc: Hope Wright
cc: Bruce Carlson
cc: Bur Filson



618/345-6220

CERTIFIED
P 063 946 254

Refer to: LPC 1190490012 - APC 1190490ADW
Madison County - Granite City/Affiliated Metals, Inc.

November 21, 1985

Mr. James D. Johnson
Affiliated Metals, Inc.
P. O. Box 1306
Granite City, Illinois 62040

Dear Mr. Johnson:

An inspection of your facility was conducted on September 11, 1985 by Jeff Benbenek, Division of Air Pollution Control, Nick Mahlandt, Division of Water Pollution Control, Mike Grant and Pat McCarthy, Division of Land Pollution Control. This inquiry concerns apparent noncompliance with the requirements of Air Pollution Control Regulations (Title 35: Illinois Administrative Code, Subtitle B) and Land Pollution Control Regulations (Title 35: Illinois Administrative Code Subtitle G). The following apparent violations were observed.

Division of Air Pollution Control

1. Operation of a sulfuric acid coil pickling line without the required Operating Permit, which is an apparent violation of 35 Ill. Adm. Code 201.144 of the Regulations.
2. Operation of a horizontal sulfuric acid storage tank without the required Operating Permit, which is also an apparent violation of 35 Ill. Adm. Code 201.144 of the Regulations.
3. Operation of a natural gas fired Sigelow boiler without the required Operating Permit, which is also an apparent violation of 35 Ill. Adm. Code 201.144 of the Regulations.

Division of Land Pollution Control

Pursuant to 35 Ill. Adm. Code 703.150(a), the owner or operator of an existing HWM facility must submit Part A of the permit application to the Agency no later than the following times, whichever comes first:

- a. Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725.
- b. Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725.

You are in apparent violation of 35 Ill. Adm. Code 703.150(a) for the following reason: Failure to comply with the requirements of item b above.



LPC 1190400012

APC 1190400012

Madison County

Granite City/Affiliated Metals, Inc. -2-

November 21, 1985

Pursuant to 35 Ill. Adm. Code 722.111, a person who generates a solid waste as defined in Section 721.102, must determine if that waste is a hazardous waste using the following method:

- a. He should first determine if the waste is excluded from regulation under Section 721.104.
- b. He must then determine if the waste is listed as a hazardous waste in Subpart D of Part 721.

Note: Even if a waste is listed, the generator still has an opportunity under Section 720.122 and 40 CFR Section 260.22 to demonstrate that the waste from his particular facility or operation is not a hazardous waste.

- c. If the waste is not listed as a hazardous waste in Subpart D of Part 721, he must determine whether the waste is identified in Subpart C of Part 721 by either:
 1. Testing the waste according to the methods set forth in Subpart C of Part 721, or according to an equivalent method approved by the Board under Section 720.120; or
 2. Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.

You are in apparent violation of this Section for the following reason:
Failure to meet the requirements of this section for the waste oil.

35 Ill. Adm. Code 722.134(b) provides that should a generator accumulate hazardous waste on-site longer than 90 days due to unforeseen, temporary and uncontrollable circumstances he may request an extension of the 90 day period from the Agency. Because you have not requested and have not been granted such an extension after accumulating hazardous waste on-site for a period longer than 90 days, you are the operator of a hazardous waste storage facility and are subject to the requirements of 35 Ill. Adm. Code 724 and 725 and the permit requirements of 35 Ill. Adm. Code 702, 703 and 705.

Pursuant to 35 Ill. Adm. Code 725.115(a), the owner or operator must inspect his facility for malfunctions and deterioration, operator errors and discharges that may be causing or may lead to a release to the environment or a threat to human health. You are in apparent violation of 35 Ill. Adm. Code 725.115(a) in that the required inspections are not being made. When the requirements of this section are implemented, they must meet the requirements of 725.115(b), (c) and (d). For your information, these requirements have been listed.



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APC 119040ADW
Madison County
Granite City/Affiliated Metals, Inc. -3-

November 21, 1985

Pursuant to 35 Ill. Adm. Code 725.115(b), the owner or operator must develop and follow a written schedule for inspection of all equipment and devices that are important to preventing, detecting or responding to environmental or human health hazards. This schedule must be kept at the facility and must identify the types of problems which are to be looked for during the inspection. The schedule should allow for daily inspection of areas subject to spills, when those areas are in use.

Pursuant to 35 Ill. Adm. Code 725.115(c), the owner or operator must remedy any deterioration or malfunction of equipment or structures revealed by an inspection. If a hazard is imminent or has already occurred, he must take immediate remedial action.

Pursuant to 35 Ill. Adm. Code 725.115(d), the owner or operator must record inspections, and the specific data required by this Section in an inspection log or summary. These records must be kept for at least three years.

Pursuant to 35 Ill. Adm. Code 725.116(a), facility personnel must complete a program of classroom instruction or on-the-job training directed by a person trained in hazardous waste management procedures. The training must be designed to ensure that facility personnel are able to respond to emergencies. You are in apparent violation of 35 Ill. Adm. Code 725.116(a) for the following reason: A training program has not been implemented. The training program must be implemented and maintained to meet the requirements of 725.116(b), (c), (d) and (e). For your information these requirements have been listed.

Pursuant to 35 Ill. Adm. Code 725.116(b), facility personnel must successfully complete the program required in paragraph (a) of this Section upon the effective date of these regulations or six months after the date of their employment or assignment to a facility or to a new position at a facility, whichever is later. Employees hired after the effective date of these regulations must not work in unsupervised positions until they have completed the training requirements of paragraph (a) of this Section.

Pursuant to 35 Ill. Adm. Code 725.116(c), facility personnel must take part in an annual review of the initial training required in paragraph (a) of this Section.



LPC 1190400012
APC 119040ADW
Madison County
Granite City/Affiliated Metals, Inc. -4-

November 21, 1985

Pursuant to 35 Ill. Adm. Code 725.116(d), the owner or operator must maintain the following documents and records at the facility:

- a. The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- b. A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education or other qualifications and duties of facility personnel assigned to each position;
- c. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this Section;
- d. Records that document that the training or job experience required under paragraphs (a), (b) and (c) of this Section has been given to and completed by facility personnel.

Pursuant to 35 Ill. Adm. Code 725.116(e), training records on current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility.

Pursuant to 35 Ill. Adm. Code 725.131, facilities must be maintained and operated to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment. You are in apparent violation of 35 Ill. Adm. Code 725.131 for the following reason: During the inspection, acid spillage was observed around the work tanks.

Pursuant to 35 Ill. Adm. Code 725.137, the owner or operator must attempt to make arrangements to familiarize local police, fire departments, emergency response teams and hospitals, as well as state authorities, with the hazardous aspects of the facility. These arrangements are to be included in the contingency plan. You are in apparent violation of 35 Ill. Adm. Code 725.137 for the following reason: Failure to meet the requirements of this section.

Pursuant to 35 Ill. Adm. Code 725.151(a), each owner or operator must have a contingency plan. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water. You are in apparent violation of 35 Ill. Adm. Code 725.151(a) for the following reason: Failure to establish a contingency plan for the facility.



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APC 119040ADW

Madison County

Granite City/Affiliated Metals, Inc. -5-

November 21, 1985

When a Contingency Plan is established, it must meet the requirements of 725.152-725.155. For your information these sections have been listed.

Pursuant to 35 Ill. Adm. Code 725.152(a), the contingency plan must describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the facility.

Pursuant to 35 Ill. Adm. Code 725.152(b), if the owner or operator has already prepared a Spill Prevention, Control and Countermeasures (SPCC) Plan in accordance with 40 CFR Part 112 or 1510 or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Section.

Pursuant to 35 Ill. Adm. Code 725.152(c), the contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors and state and local emergency response teams to coordinate emergency services, pursuant to Section 725.137.

Pursuant to 35 Ill. Adm. Code 725.152(d), the contingency plan must list names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see 725.155) and must be kept up to date.

Pursuant to 35 Ill. Adm. Code 725.152(e), the contingency plan must include an up-to-date list of all emergency equipment at the facility. The plan must include the location and a physical description of each item and a brief outline of its capabilities.

Pursuant to 35 Ill. Adm. Code 725.152(f), the contingency plan must include an evacuation plan for facility personnel, if necessary.

Pursuant to 35 Ill. Adm. Code 725.153, a copy of the contingency plan and all revisions to the plan must be:

- a) Maintained at the facility;
- b) Submitted to all local police departments, fire departments, hospitals and state and local emergency response teams.



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APC 119040ADW

Madison County

Granite City/Affiliated Metals, Inc. -6-

November 21, 1985

Pursuant to 35 Ill. Adm. Code 725.154, the contingency plan must be reviewed and immediately amended, if necessary, whenever:

- a. Applicable regulations are revised;
- b. The plan fails in an emergency;
- c. The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency.
- d. The list of emergency coordinators changes;
- e. The list of emergency equipment changes.

Pursuant to 35 Ill. Adm. Code 725.155, at all times there must be at least one emergency coordinator either on the facility premises or on call.

Pursuant to 35 Ill. Adm. Code 725.173, the owner or operator must keep a written operating record at the facility. The operating record must include the following:

- a. A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I of 35 Ill. Adm. Code 725.173;
- b. The location and quantity of each hazardous waste within the facility including cross-references to specific manifest documents numbers;
- c. Records and results of waste analyses and trial tests;
- d. Summary reports and details of all incidents that require implementation of the contingency plan;
- e. Records and results of inspections;
- f. Monitoring, testing and other analytical data;
- g. All closure cost estimates and, for disposal facilities, all post-closure cost estimates.

You are in apparent violation of 35 Ill. Adm. Code 725.173 in that the operating record did not include items b, c, e, and g above.



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Madison County

Granite City/Affiliated Metals, Inc. -7-

November 21, 1985

Pursuant to 35 Ill. Adm. Code 725.212(a), by May 19, 1981, the owner or operator must have a written closure plan. A copy of the closure plan and all revisions must be kept at the facility until closure is completed and certified. The closure plan must include at least:

- a. A description of how and when the facility will be partially closed, if applicable, and finally closed. The plan must identify how the requirements of Sections 725.211, 725.213, 725.214 and 725.215 and applicable requirements of 725.297, 725.328, 725.380, 725.410, 725.451, 725.481 and 725.504 will be met;
- b. An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility;
- c. A description of the steps needed to decontaminate facility equipment and surrounding soil if necessary;
- d. An estimate of the expected year of closure and a schedule for final closure;
- e. A provision for closure certification by an independent registered professional engineer.

You are in apparent violation of 35 Ill. Adm. Code 725.212(a) for the following reason: A closure plan for the facility has not been established.

Pursuant to 35 Ill. Adm. Code 725.292(b), hazardous waste or treated reagents must not be placed in a tank if they could cause the tank or its inner liner to rupture, leak, corrode or otherwise fail before the end of its intended life. You are in apparent violation of 35 Ill. Adm. Code 725.294(b) for the following reason: It was not determined whether the concrete storage tank was resistant to the corrosive waste it contains.

Pursuant to 35 Ill. Adm. Code 725.294, the owner or operator of a tank must inspect:

- a. Discharge control equipment (e.g., waste feed cutoff systems, bypass systems and drainage systems) at least once each operating day to ensure that it is in good working order;
- b. Data gathered from monitoring equipment (e.g., pressure and temperature gauges) at least once each operating day, to ensure that the tank is being operated according to its design;
- c. The level of waste in the tank, at least once each operating day to ensure compliance with Section 725.292(c);



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November 21, 1985

- d. The construction materials of the tank, at least weekly, to detect corrosion or leaking of fixtures or seams;
- e. The construction materials of, and the area immediately surrounding discharge confinement structures (e.g., dikes) at least weekly, to detect erosion or obvious signs of leakage (e.g., wet spots or dead vegetation).

Comment: As required by Section 725.115(c) the owner or operator must remedy any deterioration or malfunction he finds.

You are in apparent violation of 35 Ill. Adm. Code 725.294 in that items a, b, c, d and e above were not being conducted.

Please submit in writing, within fifteen (15) calendar days from the date of this letter, the reasons for the apparent violations outlined above, as well as a description of the steps which have been initiated to prevent any further recurrence of the above cited violations.

Further, take notice that non-compliance with the requirements of the State of Illinois Environmental Protection Act and Illinois Pollution Control Board Rules may be the subject of enforcement action pursuant to the Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq.

If you have any questions, please contact Jeff Benbenek (Division of Air Pollution Control) at 618/345-0700 or Mike Grant (Division of Land Pollution Control) at 618/345-4606.

Very truly yours,

ENVIRONMENTAL PROTECTION AGENCY

Robert L. Schleuger, P.E.
Regional Coordinator
Field Operations Section

RSL:MDG:JJB:jlr/0076L

Enclosure: RCRA Inspection Checklist

cc: DLPC - Collinsville
cc: DLPC - Division File
cc: DAPC - Collinsville
cc: DAPC - Central File
cc: Bruce Carlson - Enforcement ✓
cc: Bur Filson

217/782-6761

Refer to: 1190400012 -- Madison County
Granite City/Affiliated Metals, Inc.
ILDC81002215

PRE-ENFORCEMENT CONFERENCE LETTER

Certified # P 304 118 211

December 20, 1985

**RECEIVED
ENFORCEMENT PROGRAMS**

DEC 24 1985

Affiliated Metals, Inc.
Attention: Mr. James D. Johnson
Post Office Box 1306
Granite City, Illinois 62040

Environmental Protection Agency

Dear Mr. Johnson:

The Agency has previously informed Affiliated Metals, Inc. of apparent violations of the Illinois Environmental Protection Act and/or rules and regulations adopted thereunder. These apparent violations are set forth in Attachment A of this letter. In addition, the Agency hereby informs Affiliated Metals, Inc. of apparent violations of the Illinois Environmental Protection Act and/or Rules and Regulations adopted thereunder. These apparent violations are set forth in Attachments B and C of this letter.

As a result of these apparent violations, it is our intent to refer this matter to the Agency's legal staff for the preparation of a formal enforcement case. The Agency's legal staff will, in turn, refer this matter to the Office of Attorney General or to the United States Environmental Protection Agency for the filing of a formal complaint.

Prior to taking such action, however, you are requested to attend a Pre-Enforcement Conference to be held at the Division of Land Pollution Control, Collinsville Regional Office, 2009 Hall Street, Collinsville, Illinois, 62236. The purpose of this Conference will be:

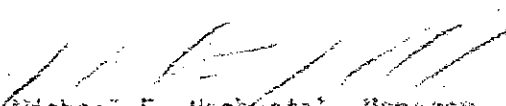
1. To discuss the validity of the apparent violations noted by Agency staff, and
2. To arrive at a program to eliminate existing and/or future violations.

You should, therefore, bring such personnel and records to the conference as will enable a complete discussion of the above items. We have scheduled the Conference for January 2, 1986 at 1:30 PM. If this arrangement is inconvenient, please contact Bill Filson at 217/782-6761 to arrange for an alternative date and time.

Page 2

In addition, please be advised that this letter constitutes the notice required by Section 31(d) of the Illinois Environmental Protection Act prior to the filing of a formal complaint. The cited Section of the Illinois Environmental Protection Act requires the Agency to inform you of the charges which are to be alleged and offer you the opportunity to meet with appropriate officials within thirty days of this notice date in an effort to resolve such conflict which could lead to the filing of formal action.

Sincerely,


Michael F. Wechsatal, Manager
Compliance Monitoring Section
Division of Land Pollution Control

MFH:BF:sd/3108a/26-27

Attachment

cc: Division File
Southern Region
Gary King
Bruce Carlson ✓
Andy Vollmer
Hope Wright
Bur Filson

Attachment A

Pursuant to 35 Ill. Adm. Code 703.150(a), the owner or operator of an existing HWM facility must submit Part A of the permit application to the Agency no later than the following times, whichever comes first:

1. Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725.
2. Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725.

You are in apparent violation of 35 Ill. Adm. Code 703.150(a) for the following reason: Failure to comply with the requirements of item b above.

Pursuant to 35 Ill. Adm. Code 722.111, a person who generates a solid waste as defined in Section 721.102, must determine if that waste is a hazardous waste using the following method:

- a. He should first determine if the waste is excluded from regulation under Section 721.104.
- b. He must then determine if the waste is listed as a hazardous waste in Subpart D of Part 721.

Note: Even if a waste is listed, the generator still has an opportunity under Section 720.122 and 40 CFR Section 260.22 to demonstrate that the waste from his particular facility or operation is not a hazardous waste.

- c. If the waste is not listed as a hazardous waste in Subpart D of Part 721, he must determine whether the waste is identified in Subpart C of Part 721 by either:
 1. Testing the waste according to the methods set forth in Subpart C of Part 721, or according to an equivalent method approved by the Board under Section 720.120; or
 2. Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.

You are in apparent violation of this Section for the following reason: Failure to meet the requirements of this section for the waste oil.

35 Ill. Adm. Code 722.134(b) provides that should a generator accumulate hazardous waste on-site longer than 90 days due to unforeseen, temporary and uncontrollable circumstances he may request an extension of the 90 day period from the Agency. Because you have not requested and have not been granted such an extension after accumulating hazardous waste on-site for a period longer than 90 days, you are the operator of a hazardous waste storage facility and are subject to the requirements of 35 Ill. Adm. Code 724 and 725 and the permit requirements of 35 Ill. Adm. Code 702, 703 and 705.

Pursuant to 35 Ill. Adm. Code 725.115(a), the owner or operator must inspect his facility for malfunctions and deterioration, operator errors and discharges that may be causing or may lead to a release to the environment or a threat to human health. You are in apparent violation of 35 Ill. Adm. Code 725.115(a) in that the required inspections are not being made. When the requirements of this section are implemented, they must meet the requirements of 725.115(b), (c) and (d). For your information, these requirements have been listed.

Pursuant to 35 Ill. Adm. Code 725.115(b), the owner or operator must develop and follow a written schedule for inspection of all equipment and devices that are important to preventing, detecting or responding to environmental or human health hazards. This schedule must be kept at the facility and must identify the types of problems which are to be looked for during the inspection. The schedule should allow for daily inspection of areas subject to spills, when those areas are in use.

Pursuant to 35 Ill. Adm. Code 725.115(c), the owner or operator must remedy any deterioration or malfunction of equipment or structures revealed by an inspection. If a hazard is imminent or has already occurred, he must take immediate remedial action.

Pursuant to 35 Ill. Adm. Code 725.115(d), the owner or operator must record inspections, and the specific data required by this Section in an inspection log or summary. These records must be kept for at least three years.

Pursuant to 35 Ill. Adm. Code 725.116(a), facility personnel must complete a program of classroom instruction or on-the-job training directed by a person trained in hazardous waste management procedures. The training must be designed to ensure that facility personnel are able to respond to emergencies. You are in apparent violation of 35 Ill. Adm. Code 725.116(a) for the following reason: A training program has not been implemented. The training program must be implemented and maintained to meet the requirements of 725.116(b), (c), (d) and (e). For your information these requirements have been listed.

Pursuant to 35 Ill. Adm. Code 725.116(b), facility personnel must successfully complete the program required in paragraph (a) of this Section upon the effective date of these regulations or six months after the date of their employment or assignment to a facility or to a new position at a facility, whichever is later. Employees hired after the effective date of these regulations must not work in unsupervised positions until they have completed the training requirements of paragraph (a) of this Section.

Pursuant to 35 Ill. Adm. Code 725.116(c), facility personnel must take part in an annual review of the initial training required in paragraph (a) of this Section.

When a Contingency Plan is established, it must meet the requirements of 725.152-725.155. For your information these sections have been listed.

Pursuant to 35 Ill. Adm. Code 725.152(a), the contingency plan must describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the facility.

Pursuant to 35 Ill. Adm. Code 725.152(b), if the owner or operator has already prepared a Spill Prevention, Control and Countermeasures (SPCC) Plan in accordance with 40 CFR Part 112 or 1510 or some other emergency or contingency plan, he need only amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Section.

Pursuant to 35 Ill. Adm. Code 725.152(c), the contingency plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors and state and local emergency response teams to coordinate emergency services, pursuant to Section 725.137.

Pursuant to 35 Ill. Adm. Code 725.152(d), the contingency plan must list names, addresses and phone numbers (office and home) of all persons qualified to act as emergency coordinator (see 725.155) and must be kept up to date.

Pursuant to 35 Ill. Adm. Code 725.152(e), the contingency plan must include an up-to-date list of all emergency equipment at the facility. The plan must include the location and a physical description of each item and a brief outline of its capabilities.

Pursuant to 35 Ill. Adm. Code 725.152(f), the contingency plan must include an evacuation plan for facility personnel, if necessary.

Pursuant to 35 Ill. Adm. Code 725.153, a copy of the contingency plan and all revisions to the plan must be:

- a) Maintained at the facility;
- b) Submitted to all local police departments, fire departments, hospitals and state and local emergency response teams.

Pursuant to 35 Ill. Adm. Code 725.116(d), the owner or operator must maintain the following documents and records at the facility:

1. The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
2. A written job description for each position listed under paragraph (d)(1) of this Section. This description may be consistent in its degree of specificity with descriptions for other similar positions in the same company location or bargaining unit, but must include the requisite skill, education or other qualifications and duties of facility personnel assigned to each position;
3. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed under paragraph (d)(1) of this Section;
4. Records that document that the training or job experience required under paragraphs (a), (b) and (c) of this Section has been given to and completed by facility personnel.

Pursuant to 35 Ill. Adm. Code 725.116(e), training records on current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility.

Pursuant to 35 Ill. Adm. Code 725.131, facilities must be maintained and operated to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment. You are in apparent violation of 35 Ill. Adm. Code 725.131 for the following reason: During the inspection, acid spillage was observed around the work tanks.

Pursuant to 35 Ill. Adm. Code 725.137, the owner or operator must attempt to make arrangements to familiarize local police, fire departments, emergency response teams and hospitals, as well as state authorities, with the hazardous aspects of the facility. These arrangements are to be included in the contingency plan. You are in apparent violation of 35 Ill. Adm. Code 725.137 for the following reason: Failure to meet the requirements of this section.

Pursuant to 35 Ill. Adm. Code 725.151(a), each owner or operator must have a contingency plan. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water. You are in apparent violation of 35 Ill. Adm. Code 725.151(a) for the following reason: Failure to establish a contingency plan for the facility.

Pursuant to 35 Ill. Adm. Code 725.154, the contingency plan must be reviewed and immediately amended, if necessary, whenever:

- a. Applicable regulations are revised;
- b. The plan fails in an emergency;
- c. The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency.
- d. The list of emergency coordinators changes;
- e. The list of emergency equipment changes.

Pursuant to 35 Ill. Adm. Code 725.155, at all times there must be at least one emergency coordinator either on the facility premises or on call.

Pursuant to 35 Ill. Adm. Code 725.173, the owner or operator must keep a written operating record at the facility. The operating record must include the following:

- a. A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I of 35 Ill. Adm. Code 725.173;
- b. The location and quantity of each hazardous waste within the facility including cross-references to specific manifest documents numbers;
- c. Records and results of waste analyses and trial tests;
- d. Summary reports and details of all incidents that require implementation of the contingency plan;
- e. Records and results of inspections;
- f. Monitoring, testing and other analytical data;
- g. All closure cost estimates and, for disposal facilities, all post-closure cost estimates.

You are in apparent violation of 35 Ill. Adm. Code 725.173 in that the operating record did not include items b, c, e, and g above.

Pursuant to 35 Ill. Adm. Code 725.212(a), by May 19, 1981, the owner or operator must have a written closure plan. A copy of the closure plan and all revisions must be kept at the facility until closure is completed and certified. The closure plan must include at least:

1. A description of how and when the facility will be partially closed, if applicable, and finally closed. The plan must identify how the requirements of Sections 725.211, 725.213, 725.214 and 725.215 and applicable requirements of 725.297, 725.328, 725.380, 725.410, 725.451, 725.461 and 725.504 will be met;
2. An estimate of the maximum inventory of wastes in storage and in treatment at any time during the life of the facility;
3. A description of the steps needed to decontaminate facility equipment and surrounding soil if necessary;
4. An estimate of the expected year of closure and a schedule for final closure;
5. A provision for closure certification by an independent registered professional engineer.

You are in apparent violation of 35 Ill. Adm. Code 725.212(a) for the following reason: A closure plan for the facility has not been established.

Pursuant to 35 Ill. Adm. Code 725.292(b), hazardous waste or treated reagents must not be placed in a tank if they could cause the tank or its inner liner to rupture, leak, corrode or otherwise fail before the end of its intended life. You are in apparent violation of 35 Ill. Adm. Code 725.294(b) for the following reason: It was not determined whether the concrete storage tank was resistant to the corrosive waste it contains.

Pursuant to 35 Ill. Adm. Code 725.294, the owner or operator of a tank must inspect:

- a. Discharge control equipment (e.g., waste feed cutoff systems, bypass systems and drainage systems) at least once each operating day to ensure that it is in good working order;
- b. Data gathered from monitoring equipment (e.g., pressure and temperature gauges) at least once each operating day, to ensure that the tank is being operated according to its design;
- c. The level of waste in the tank, at least once each operating day to ensure compliance with Section 725.292(c);

- d. The construction materials of the tank, at least weekly, to detect corrosion or leaking of fixtures or seams;
- e. The construction materials of, and the area immediately surrounding discharge confinement structures (e.g., dikes) at least weekly, to detect erosion or obvious signs of leakage (e.g., wet spots or dead vegetation).

Comment: As required by Section 725.115(c) the owner or operator must remedy any deterioration or malfunction he finds.

You are in apparent violation of 35 Ill. Adm. Code 725.294 in that items a, b, c, d and e above were not being conducted.

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Attachment 3

1. 35 Ill. Adm. Code 722.141(a) requires the generator to submit to the Agency on a form provided by the Agency an Annual Report for all hazardous waste shipped off-site. The report is due March 1 for the preceding calendar year. You are in apparent violation of this Section in that you have failed to submit the required Annual Report(s).
2. Pursuant to 35 Ill. Adm. Code 725.175, the owner or operator must prepare and submit a single copy of an annual report to the Director by March 1 of each year. The annual report must cover facility activities during the previous calendar year and must include the following information:
 - a. The EPA identification number, name and address of the facility;
 - b. The calendar year covered by the report;
 - c. For off-site facilities, the EPA identification number of each hazardous waste generator from which the facility received a hazardous waste during the year; for imported shipments, the report must give the name and address of the foreign generator;
 - d. A description and the quantity of each hazardous waste the facility received during the year. For off-site facilities this information must be listed by EPA identification number of each generator;
 - e. The method of treatment, storage or disposal for each hazardous waste;
 - f. Monitoring data under Section 725.354(a)(2)(B) and (C) and (b)(2) where required;
 - g. The most recent closure cost estimate under Section 725.342 and for disposal facilities the most recent post-closure cost estimate under Section 725.264;
 - h. The certification signed by the owner or operator of the facility or his authorized representative.

You are in apparent violation of 35 Ill. Adm. Code 725.175 for the following reason: You have failed to submit the required annual report(s).

For your information enclosed are the Annual Report forms to be completed and returned to the Agency.

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Attachment C

1. Pursuant to 35 Ill. Adm. Code 725.242(a), the owner or operator must prepare a written estimate, in current dollars, of the cost of closing the facility in accordance with the closure plan as specified in Section 725.212. You have failed to provide a closure cost estimate as required. The closure cost estimate must equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure the most expensive, as indicated by its closure plan. You are in apparent violation of 35 Ill. Adm. Code 725.242(a) for the following reason(s): You have failed to provide a written estimate for the cost of closing your facility.
2. Pursuant to 40 CFR 265.143 (as incorporated by reference in 35 Ill. Adm. Code 725.243), an owner or operator of each facility must establish financial assurance for closure of the facility. You have failed to provide adequate documentation demonstrating compliance with this section. You are in apparent violation of 35 Ill. Adm. Code 725.243 for the following reason(s): You have failed to establish financial assurance for closure of your facility.
3. Pursuant to 40 CFR 265.147(a) (as incorporated by reference in 35 Ill. Adm. Code 725.245), the owner or operator of a hazardous waste treatment, storage or disposal facility must demonstrate financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the facility or group of facilities. The owner or operator must have and maintain liability coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs. You are in apparent violation of 35 Ill. Adm. Code 725.245 for the following reason(s): You have failed to provide the required liability coverage.

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